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**From:** LEE, LILY [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D6085A744F9347E6836C54C0E85B97B2-LLEE06]  
**Sent:** 8/15/2018 2:30:18 PM  
**To:** Lane, Jackie [Lane.Jackie@epa.gov]; Yogi, David [Yogi.David@epa.gov]; Chesnutt, John [Chesnutt.John@epa.gov]  
**Subject:** From Erik Brooks Fwd: Public Comment: Radiological Retesting at Hunters Point Naval Shipyard (HPNS) - Parcel G Work Plan - June 2018

Sent from my iPhone

Begin forwarded message:

**From:** Eric Brooks [Ex. 6 Personal Privacy (PP)]  
**Date:** August 15, 2018 at 12:29:05 AM PDT  
**To:** Steve Zeltzer [Ex. 6 Personal Privacy (PP)], Sumchai Ahimsa Porter Dr.  
[Ex. 6 Personal Privacy (PP)], Angel Bradley <bradley@greenaction.org>, "sheridan@greenaction.org Sheridan Unamoto" <sheridan@greenaction.org>, Anton David [Ex. 6 Personal Privacy (PP)], Castleman Steven <scastleman@ggu.edu>, "Tomkins Dr. Ray" [Ex. 6 Personal Privacy (PP)], Bonner Charles [Ex. 6 Personal Privacy (PP)], Harvey Carol [Ex. 6 Personal Privacy (PP)], "Muhammad, Christopher" [Ex. 6 Personal Privacy (PP)], Brother Miles [Ex. 6 Personal Privacy (PP)], Marie Harrison [Ex. 6 Personal Privacy (PP)], Pierce Michelle [Ex. 6 Personal Privacy (PP)], Jin Zhu [Ex. 6 Personal Privacy (PP)], Elaine Brown [Ex. 6 Personal Privacy (PP)], [Ex. 6 Personal Privacy (PP)], Roberts Chris [Ex. 6 Personal Privacy (PP)], John Diaz [Ex. 6 Personal Privacy (PP)], [Ex. 6 Personal Privacy (PP)], [Ex. 6 Personal Privacy (PP)], Lee Lily <Lee.Lily@EPA.gov>, Bayview Hunters Point Environment Justice Response Task Force [Ex. 6 Personal Privacy (PP)], Hubert Martha [Ex. 6 Personal Privacy (PP)], Blomé Toby [Ex. 6 Personal Privacy (PP)]  
**Subject:** Fwd: Public Comment: Radiological Retesting at Hunters Point Naval Shipyard (HPNS) - Parcel G Work Plan - June 2018

Hi all,

So that you have a record of it and can reference it, here is the public comment that I emailed on the Parcel G retesting plan, at exactly 1 minute before midnight on Tuesday, August 14.

TO:

Derek Robinson  
BRAC Environmental Coordinator, HPNS  
Navy BRAC PMO West  
33000 Nixie Way  
Bldg 50, 2nd Floor  
San Diego, CA. 92147

From:

Eric Brooks  
Campaign Coordinator  
Our City San Francisco

1104 Polk Street #225

San Francisco, California 94109

(NOTE: Please send responses to these comments by email, not by postal mail.)

PUBLIC COMMENT: RADIOLOGICAL RETESTING AT HUNTERS POINT NAVAL SHIPYARD (HPNS) - PARCEL G WORK PLAN - JUNE 2018

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To Derek Robinson and whom it may concern,

After looking over the Radiological Retesting at Hunters Point Naval Shipyard (HPNS), Parcel G Work Plan, June 2018 I have found it to be wholly and egregiously inadequate to ensuring a proper and safe cleanup of all current and former Navy base properties in San Francisco, for the following reasons.

The plan is far too limited in scope because:

- 1) It is solely a plan for Parcel G. All parcels of all current and former Navy base properties in San Francisco including Treasure Island and Yerba Buena Island must clearly be retested. Tetra Tech and other contractors also did extensive testing and cleanup work on Treasure Island and Yerba Buena Island since the early 1990s (see links below these comments). Furthermore, in 2012 and other years, whistleblowers have come forward indicating wrongdoing in cleanup and testing done by contractors including Tetra Tech and Shaw Environmental, on Treasure Island - just as whistleblowers have come forward to reveal testing and cleanup falsification in the Bayview Hunters Point. Therefore all previous testing and cleanup task must be fully retested on all current and former Navy base properties in San Francisco including Treasure Island and Yerba Buena Island.
- 2) It retests only for radioactive contamination, when all chemical contamination tests must be redone, not solely radiological tests. It is inconceivable that Tetra Tech and other contractors guilty of wrongdoing on these properties, only engaged in such wrongdoing in relation to radiological contaminants. All testing and cleanup tasks for all contaminants must be completely retested.
- 3) It is not a plan to retest every single test and clean up task done previously by Tetra Tech and other contractors. All tests and cleanup tasks that have been done for radiological and all other chemical contaminants, on all current and former Navy base properties in San Francisco, including Treasure Island and Yerba Buena Island, must be comprehensively retested and reexamined for all time periods, throughout the entire cleanup history on these properties, all the way back to the late 1980s, in order to ensure proper retesting and cleanup.
- 4) It contains no plans to do new testing where radiological and other contaminants may have drifted, floated, seeped, leached, shifted or otherwise made their way into other areas, thereby contaminating new areas, and/or further contaminating existing contaminated properties in new ways; including areas and properties outside of the current and former Navy base properties. All such areas must be comprehensively tested.
- 5) It is plan only to retest the work of Tetra Tech. Because the Navy and other agencies were clearly egregiously lax and inadequate in their oversight of Tetra Tech, it follows that any and all contractors which have done cleanup work on all current and former Navy base properties in San Francisco, including Treasure Island and Yerba Buena Island, may also have falsified tests, clean up tasks, and records. Therefore all work of all cleanup and cleanup oversight contractors, for the entire testing and cleanup history of all of these properties, must be retested and reexamined.

6) It unacceptably allows other contractors which have closely worked previously with Tetra Tech and other contractors on these properties to oversee the retesting. No contractor which has done previous work on any parcels of all current and former Navy base properties in San Francisco including Treasure Island and Yerba Buena Island, must be allowed to oversee the retesting, because they may also have been involved in wrongdoing and/or may have inherent conflicts of interest in overseeing retesting done by firms with which they have worked in the past. For example, Tetra Tech and Battelle have historically worked very closely together on past cleanup tasks, testing and assessment of all these properties. It is therefore unacceptable for Battelle to oversee the retesting. All oversight and retesting must be done by fully independent contractors which have never work on any of these properties in the past or have working and/or financial relationships with the firms whose work is being retested.

7) It contains no plans to assess how geological, climate, weather, and human and wildlife interactions with all of these properties, and any other properties which may have been contaminated, may complicate or exacerbate the problems that exist because testing and clean up was not done properly and comprehensively. This plan must be revised to consider all of these factors. Interactions of these properties (and contaminants in and on these properties) with potential sea level rise, earthquake activity and liquefaction, climate disruption, weather disruption, tsunamis, storm surges, wildfires, and human and wildlife interactions, must all be assessed for their potential to exacerbate problems, contamination dangers, and contamination spread, that may be caused by the failure of the sites to be properly cleaned up. These assessments must include analyses of both current and possible cumulative impacts and synergistic effects between all of these factors, and between all contaminants themselves.

Finally, because of these noted serious inadequacies in this plan, far more time and far more funding must be made available to enable the far more comprehensive retesting that is needed as described above. If funding cannot be identified, then all work on all current and former Navy base properties in San Francisco including Treasure Island and Yerba Buena Island must be completely halted until such finding is made available.

For reference to these comments, here is a comprehensive list of Navy site links which shows the extensive work that Tetra Tech performed on Treasure Island and Yerba Buena Island.

Here is the link to one of many documents you can find with a web search showing that Tetra Tech did the same type of work for the Navy on Treasure Island:

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/Basewide/TI\\_201508\\_SMPDraft.pdf](https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former_naval_station_treasure_island/pdfs/environmental/Basewide/TI_201508_SMPDraft.pdf)

Here are the two links to Tetra Tech's 2014 assessment of radiological contamination on Treasure Island:

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/hra/TI\\_20140701\\_HRASTM\\_pt1of2.pdf](https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former_naval_station_treasure_island/pdfs/environmental/hra/TI_20140701_HRASTM_pt1of2.pdf)

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/hra/TI\\_20140701\\_HRASTM\\_pt2of2.pdf](https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former_naval_station_treasure_island/pdfs/environmental/hra/TI_20140701_HRASTM_pt2of2.pdf)

Here is the link to Tetra Tech's 2006 "Finding of Suitability to Transfer Property" which contains its extensive analysis of a vast array of contaminants on the entire expanse of Treasure Island.

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/hra/TI\\_20060701\\_HRASTM.pdf](https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former_naval_station_treasure_island/pdfs/environmental/hra/TI_20060701_HRASTM.pdf)

[sland/pdfs/other/TI\\_20060215\\_FOST\\_TI.pdf](#)

To see all of the other Navy Treasure Island documents (all prepared by Tetra Tech) which show Tetra Tech's ongoing extensive work on both Treasure Island and Yerba Buena Island going all of the way back to \*1992\* (with the most recent work listed first) go to:

#### Overall Work

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/Basewide/TI\\_20141215\\_FiveYearReview.pdf](#)

[https://www.bracpmo.navy.mil/brac\\_bases/california/former\\_ns\\_treasure\\_island/documents2.html](#)

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/Basewide/TI\\_201312\\_SMP.pdf](#)

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/Basewide/TI\\_20120911\\_SMP.pdf](#)

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/Basewide/TI\\_201112\\_SMP.pdf](#)

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/Basewide/TI\\_20101029\\_SMP.pdf](#)

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/Basewide/TI\\_20090928\\_SMP.pdf](#)

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/other/TI\\_20060322\\_FOST\\_YBI.pdf](#)

#### Radiological

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/other/TI\\_20120918\\_PublicInfoSessionTranscript.pdf](#)

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/TI\\_20120806\\_HRA\\_SuppTM.pdf](#)

and search for Tetra Tech in the Following:

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/TI\\_200602\\_HRA.pdf](#)

#### Site 12

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/Site12/TI\\_20070215\\_AM-IRAP\\_NTCRA\\_SWDA\\_Site12.pdf](#)

and search for Tetra Tech in the Following:

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/Site12/TI\\_20070226\\_RAWrkPln-RD\\_NTCRA\\_SWDA\\_Site12.pdf](#)

Site 27

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/Site27/TI\\_201307\\_RAWorkplan\\_Site27.pdf](https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former_naval_station_treasure_island/pdfs/environmental/Site27/TI_201307_RAWorkplan_Site27.pdf)

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/Site27/TI\\_20120328\\_ROD\\_Site27.pdf](https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former_naval_station_treasure_island/pdfs/environmental/Site27/TI_20120328_ROD_Site27.pdf)

Site 28

search for Tetra Tech in the Following:

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/Site28/TI\\_201012\\_ROD\\_Site28.pdf](https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former_naval_station_treasure_island/pdfs/environmental/Site28/TI_201012_ROD_Site28.pdf)

Site 30

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/Site30/TI\\_200611\\_FS\\_Site30.pdf](https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former_naval_station_treasure_island/pdfs/environmental/Site30/TI_200611_FS_Site30.pdf)

Site 31

[https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former\\_naval\\_station\\_treasure\\_island/pdfs/environmental/Site31/TI\\_200702\\_FS\\_Site31.pdf](https://www.bracpmo.navy.mil/content/dam/bracpmo/california/former_naval_station_treasure_island/pdfs/environmental/Site31/TI_200702_FS_Site31.pdf)

Sincerely,

Eric Brooks

Campaign Coordinator

Our City San Francisco

1104 Polk Street #225

San Francisco, California 94109

(NOTE: Please send responses to these comments by email, not by postal mail.)